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11 Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ZOYA KOVALENKO,

Plaintiff,

1.8 v.

19 KIRKLAND & ELLIS LLP, MICHAEL DE
20 VRIES, MICHAEL W. DE VRIES, P.C.,
21 ADAM ALPER, ADAM R. ALPER, P.C.,
AKSHAY DEORAS, AKSHAY S. DEORAS,
P.C., AND MARK FAHEY,

Defendants.

Case No. 4:22-CV-05990-HSG

**DECLARATION OF MARK R.
THOMPSON IN SUPPORT OF JOINT
ADMINISTRATIVE MOTION TO FILE
HEARING TRANSCRIPT UNDER
SEAL.**

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DECLARATION OF MARK R. THOMPSON
ISO JOINT ADMINISTRATIVE MOTION TO
FILE HEARING TRANSCRIPT UNDER
SEAL [4:22-CV-05990-HSG]

1 I, Mark R. Thompson, hereby declare:

2 1. I am an attorney at the law firm of Orrick, Herrington & Sutcliffe, LLP. I represent
3 Defendants Kirkland & Ellis LLP, Michael De Vries, Michael W. De Vries, P.C., Adam Alper,
4 Adam R. Alper, P.C., Akshay Deoras, Akshay S. Deoras, P.C., and Mark Fahey (collectively,
5 “Defendants”) in this matter. I submit this declaration in support of the parties’ Joint Administrative
6 Motion to Seal Hearing Transcript (the “Joint Motion”). I have personal knowledge of the matters
7 contained in this declaration. If called to testify to the matters set forth in this declaration, I would
8 do so competently.

9 2. Good cause exists to seal portions of the transcript of the hearing held on March 6,
10 2025 (the “Hearing Transcript”). Based on my professional experience, I believe that disclosure of
11 certain information therein would prejudice both Defendants’ and Plaintiff Zoya Kovalenko’s
12 interests in this action.

13 3. The parties have tailored their Joint Motion to seek sealing of only the information
14 contained in the Hearing Transcript that is necessary to protect the applicable interest in sealing.

15 4. Attached as **Exhibit A** is a true and correct copy of the Hearing Transcript with
16 proposed redactions highlighted.

17 I declare under penalty of perjury under the laws of the United States of America that the
18 foregoing is true and correct. Executed on March 27, 2025.

19 _____
20 /s/ Mark R. Thompson
Mark R. Thompson